



1155 Avenue of the Americas
22nd Floor
New York, NY 10036-2711

T +1.212.262.6900
F +1.212.977.1649
PerkinsCoie.com

June 3, 2022

Adam R. Mandelsberg
AMandelsberg@perkinscoie.com
D. +1.212.261.6867
F. +1.212.399.8067

VIA CM/ECF

Hon. Lorna G. Schofield
United States District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square - Courtroom 1106
New York, New York 10007

Re: *Jose Rodriguez v. Target Corporation, Case No. 1:22-cv-02982 (LGS)*

Dear Judge Schofield:

We write on behalf of Defendant Target Corporation (“Target”) with respect to the above-referenced action. Target respectfully submits this letter motion pursuant to Rule I(B)(2) of Your Honor’s Individual Practices to request that the Court adjourn the telephonic initial conference presently set for June 22, 2022 and all associated pre-trial deadlines. Counsel for Plaintiff Jose Rodriguez has represented that he intends to file an amended complaint in advance of the filing deadline for Target’s intended motion to dismiss, due on or before June 17, 2022. A briefing schedule for the motion to dismiss has yet to be set.

Counsel for Plaintiff Jose Rodriguez consented to the present request, which constitutes the first request for an adjournment or extension of time for the initial conference in this matter.

We thank Your Honor for your consideration.

Respectfully submitted,

/s/ Adam R. Mandelsberg
Adam R. Mandelsberg

cc: All counsel of record

Application GRANTED. The initial pretrial conference scheduled for June 22, 2022, is adjourned to **July 13, 2022, at 4:20 P.M.** The parties shall call 888-363-4749 and use the access code 558-3333. The parties shall file the joint letter and proposed civil case management plan and scheduling order required by the Order at Dkt. No. 6 by **July 6, 2022, at 12:00 P.M.** If Defendant does not consent in writing to the filing of an amended complaint and Plaintiff intends to seek leave of the court, Plaintiff shall file a letter to that effect by **June 9, 2022**, attaching a proposed amended complaint, marked to show changes from the current complaint.

So Ordered.

Dated: June 3, 2022
New York, New York

LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE